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Attorneys for Choates G. Contracting, LLC, Chapter 11 Debtor

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

IN RE:

Case No.: 21-13085-ABA

Choates G. Contracting, LLC

Chapter No.: 11

**DEBTOR'S OBJECTION TO MOTION FOR RELIEF FROM AUTOMATIC STAY RE: 122 DANTON
LANE, MULICA HILL, NEW JERSEY**

Choates G. Contracting, LLC, Debtor, by and through counsel, objects to the motion for relief with respect to 122 Danton Lane, Mullica Hill, New Jersey and in support thereof states:

1. The Debtor has already come current on the post-petition arrears.
2. The Creditor's certification regarding post-petition payment history states that the Debtor had post-petition payment arrears totaling \$13,842.08.
3. The Creditor's certification regarding post-petition payment history did not reflect a payment the Debtor made in the amount of \$4,045.60 on May 25, 2022 (confirmation number 194789101).
4. Following the motion for relief, the Debtor tendered an additional payment of \$10,000 on May 25, 2022 (confirmation number 194803052).

5. Movant's counsel has acknowledged that the Movant received both of these payments.
6. The parties are in the process of working on an agreed order to resolve the motion for relief.
7. This objection is filed to preserve simply to preserve the Debtor's rights so that an order for relief is not inadvertently entered in the absence of a filed objection.

Respectfully submitted,

McDowell Law, PC
Attorney for Debtor

BY: /s/ Daniel L. Reinganum
Daniel L. Reinganum

Applicant: US Bank National Association, as
Trustee for Velocity Commercial Capital
Loan Trust 2019-02

Applicant's Counsel: Steven P. Kelley, Esq.

Debtor's Counsel: Daniel L. Reinganum

Property Address: 122 Danton Lane, Mullica Hill, NJ 08062
(the 'Collateral')

FOR GOOD CAUSE SHOWN, it is **ORDERED** that Applicant's Motion for Relief is resolved, subject to the following conditions.

1. As of the filing of the Motion for Relief, Debtor was four months overdue in post-petition payments, from February 1, 2022 to May 1, 2022 at **\$4,045.60** per month.
2. Debtor had a balance held in suspense of **\$2,340.32**.
3. Accordingly, the Debtor's total payment arrears were **\$13,842.08**.
4. Since the filing of the Motion for Relief, Applicant acknowledges receipt of funds totaling **\$14,045.60**.
5. Beginning June 1, 2022, regular monthly mortgage payments shall continue to be made in the amount of **\$4,045.60** or as adjusted under any applicable bankruptcy or non-bankruptcy law. Debtor shall ensure that the loan number appears on each payment.
6. If paid by check, the Debtor shall tender the regular monthly payments to the following address:

Nationstar Mortgage, LLC
ATTN: BK Payments
PO Box 619094
Dallas, TX 75261-9741

7. If the Debtor fails to make any regular monthly payment within thirty (30) days of the date the payment(s) are due, then the Secured Creditor/Applicant may obtain an Order Vacating the Automatic Stay as to the Collateral by filing, with the Bankruptcy Court, a Certification specifying the Debtor's failure to comply with this Order. At the time

the Certification is filed with the court, a copy of the Certification shall be sent to the Debtor, the Debtor's attorney, and the Sub-Chapter V Trustee, Douglas Stanger.

8. Applicant shall be entitled to assess any attorney's fees and costs associated with the Motion for Relief to the Debtor's account pursuant to the terms and conditions of the Note and Mortgage executed by the Debtor.

I consent to the form and entry of this order:

BY: _____
Daniel L. Reinganum, Esq.
McDowell Law, PC
Attorney for Debtor

BY: _____
Steven Kelly, Esq.
Stern & Eisenberg, PC
Attorney for Movant